



# Axita Cotton Limited

**Mfg. & Exporter of Cotton**

CIN No. : L17200GJ2013PLC076059  
GST IN : 24AALCA8092L1Z6  
PAN : AALCA8092L

Reg. Office : Servey No. 324, 357, 358, Kadi Thol Road, Borisana Kadi,  
Mahesana-382715. Gujarat. India

Tele : +91 6358747514 | E-mail : cs@axitacotton.com | Website : www.axitacotton.com

ISO 9001:2015  
CERTIFIED

Date: 24/07/2021

To,  
Dept. of Corporate Services,  
**BSE Limited**  
25<sup>th</sup> Floor, Phiroze Jeejeebhoy Tower,  
Dalal Street, Fort,  
Mumbai-400 001.

Dear Sir/Madam,

**Ref.: Axita Cotton Limited (Security Code/Security Id: 542285/AXITA).**

**Sub.: Clarification Letter regarding Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 submitted on July 14, 2021 by Mr. Nitinbhai Govindbhai Patel & Mr. Amitkumar Govindbhai Patel, Promoter of the Company.**

With reference to the above subject, please find attached herewith Clarification Letter regarding Disclosure under Regulation 7 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 submitted on July 14, 2021 by Mr. Nitinbhai Govindbhai Patel & Mr. Amitkumar Govindbhai Patel, Promoter of the Company.

This letter is not an intimation of any new transaction. Please treat this letter as a clarification letter regarding earlier disclosure submitted on July 14, 2021 under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 by Mr. Nitinbhai Govindbhai Patel & Mr. Amitkumar Govindbhai Patel, Promoter of the Company. Therefore, I

*Plas*



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request you not consider this letter as a new intimation under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly take the same on your record.

Thanking You,

**For, Axita Cotton Limited**

**Kushal Nitinbhai Patel**

**Managing Director**

**DIN: 06626639**

**Encl.: A/a.**



**Date: July 23, 2021**

To,  
**BSE Limited**  
P.J. Towers,  
Dalal Street,  
Mumbai-400 001, Maharashtra.

To,  
**Axita Cotton Limited**  
Servey No. 324 357 358 Kadi Thol Road  
Borisana Kadi  
Mahesana- 382715, Gujarat

Dear Sir/Madam,

**Sub: Clarification Letter regarding Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 submitted on July 14, 2021.**

**Ref: Disclosure submitted on July 14, 2021, under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for inter-se transfer through off-market of 6,76,000 number of Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel (My self) to Mr. Nitinbhai Govindbhai Patel.**

With reference to earlier disclosure submitted on July 14, 2021 under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for inter-se transfer through off-market of 6,76,000 number of Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel (My self) to Mr. Nitinbhai Govindbhai Patel has completed on July 21, 2021.

Earlier disclosure (dated July 14, 2021) submitted based on delivery instruction slip dated July 12, 2021 executed by me for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited in which requisite procedural requirements was pending from NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited), which has completed on July 21, 2021.

This letter is a clarification letter for giving information about earlier Inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel (My Self) to Mr. Nitinbhai Govindbhai Patel has completed on July 21, 2021.

This letter is not an intimation of any new transaction. Please treat this letter as a clarification letter regarding earlier disclosure submitted on July 14, 2021, under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015. Therefore, I request you not consider this letter as a new intimation under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

*Amita. Patel*

**AMITKUMAR GOVINDBHAI PATEL**

**Address: Narayan Bhuvan, Kailash Kunj Society, B/h. Lal Bunglow, Ellisbridge, Ahmedabad-380006, Gujarat.**

I hope that I have made my intentions clear in this letter.

A copy of the earlier disclosure submitted on July 14, 2021, under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 is enclosed for ready reference.

Kindly take this information on your record.

Thanking You.

*Amita. Patel*

**Amitkumar Govindbhai Patel**  
**Seller**  
**(Promoter)**

**Enclosed: A/a.**

**AMITKUMAR GOVINDBHAI PATEL**

**Address: Narayan Bhuvan, Kailash Kunj Society, B/h. Lal Bungalow, Ellisbridge, Ahmedabad-380006, Gujarat.**

**Date: July 14, 2021**

To,  
**BSE Limited**  
P.J. Towers,  
Dalal Street,  
Mumbai-400 001, Maharashtra.

To,  
**Axita Cotton Limited**  
Survey No. 324 357 358 Kadi Thol Road Borisana  
Kadi  
Mahesana- 382715, Gujarat

Dear Sir/Madam,

**Sub: Disclosure under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015.**

I, Amitkumar Govindbhai Patel, promoter of Axita Cotton Limited hereby submit disclosures under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited to Nitinbhai Govindbhai Patel.

I, Amitkumar Govindbhai Patel hereby submits this disclosure based on delivery instruction slip (hereinafter known as "DIS" dated July 12, 2021) submitted by me, and requisite procedural requirements of NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited) are under process for transfer of 6,76,000 Locked in Equity Shares . I am submitting this disclosure herewith for better compliance purposes. I will further re-submit disclosure post completion process of inter-se transfer of 6,76,000 Locked in Equity Shares.

In view of the subject matter, you are requested to take this on records and do the needful.

Kindly take this information on your record.

Thanking You.

*Amit C. Patel*  
**Amitkumar Govindbhai Patel**  
Seller  
(Promoter)

Enclosed: A/a.



**FORM C**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7(2) read with Regulation 6(2) – Continual Disclosure]**

Name of the Company: Axita Cotton Limited  
ISIN of the Company: INE02EZ01014

Details of change in holding of Securities of Promoter, Member of Promoter Group, Designated Person or Director of a listed company and immediate relative of such persons and other persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoter/Member of the Promoter group/ Designated Person/ Directors/ immediate relative to/ others etc.)	Security held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment/advise/ Acquisition of shares/ disposal of shares, Specify		Date of intimation to Company	Mode of acquisition/ Disposal (on market/ public/ rights/ preferential offer/ off market/ Inter-se Transfer/ ESOPs. Etc.)	Exchange on which the trade was executed
		Type of Security (for e.g. - Shares Warrants Convertible Debentures, Rights entitlement etc.)	No. and % of Shareholding	Type of Security (for e.g. - Shares Warrants Convertible Debentures, Rights entitlement etc.)	No.	Value (Rs.)	Transaction Type (Purchase/ Sell/ Pledge/ Revocation/ Invokation/ Other Please specify)	Type of Security (for e.g. - Shares Warrants Convertible Debentures, Rights entitlement etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Name: Amitkumar Govindbhai Patel  PAN: AETPP8859D  CIN: N.A.  DIN: 06626585  Address: Narayan Bhuvan, Kailash Kunj Society, B/h. Lal Bungalow, Ellisbridge, Ahmedabad-380006, Gujarat.  Contact No.: +91 9824631832	Promoter	Equity Shares (Locked-in)	8,76,400 And 6.688%	Equity Shares (Locked-in)	6,76,000	1,86,57,600	Sell (Inter-se Transfer through Off-Market)	Equity Shares (Locked-in)	2,00,400 And 1.529%	12/07/2021	12/07/2021	14/07/2021	Inter-se Transfer through Off-Market	BSE Limited

Note:

- i. "Securities shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- ii. Value of transaction excludes taxes/brokerage/any other charges

*Amit G. Patel*

**Amitkumar Govindbhai Patel**  
**Promoter**  
**Date: 14/07/2021**  
**Place: Kadi**

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22
-	-	-	-	-	-	-

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

*Amit G. Patel*

Amitkumar Govindbhai Patel  
Promoter  
Date: 14/07/2021  
Place: Kadi

Date: July 23, 2021

To,  
**BSE Limited**  
P.J. Towers,  
Dalal Street,  
Mumbai-400 001, Maharashtra.

To,  
**Axita Cotton Limited**  
Servey No. 324 357 358 Kadi Thol Road  
Borisana Kadi  
Mahesana- 382715, Gujarat

Dear Sir/Madam,

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**Ref: Disclosure submitted on July 14, 2021 under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for inter-se transfer through off-market of 6,76,000 number of Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel to me.**

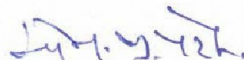
With reference to earlier disclosure submitted on July 14, 2021 under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for inter-se transfer through off-market of 6,76,000 number of Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel to me has completed on July 21, 2021.

Earlier disclosure (dated July 14, 2021) submitted based on delivery instruction slip dated July 12, 2021 executed by Mr. Amitkumar Govindbhai Patel for inter-se transfer through off-market of 6,76,000 number of Locked-in Equity Shares of Axita Cotton Limited in which requisite procedural requirements was pending from NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited), which has completed on July 21, 2021.

This letter is a clarification letter for giving information about earlier Inter-se transfer through off-market of 6,76,000 Locked-in Equity Shares of Axita Cotton Limited from Mr. Amitkumar Govindbhai Patel to me has completed on July 21, 2021.

This letter is not an intimation of any new transaction. Please treat this letter as a clarification letter regarding earlier disclosure submitted on July 14, 2021 under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015. Therefor, I request you not consider this letter as a new intimation under Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

I hope that I have made my intentions clear in this letter.





**NITINBHAI GOVINDBHAI PATEL**

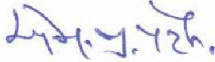
**Address: B/303, Ashutosh Avenue, Opp. Vasupujya Tower, Naranpura, Ahmedabad-380013, Gujarat.**

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Kindly take this information on your record.

Thanking You.



**Nitinbhai Govindbhai Patel**

**Acquirer**

**(Promoter)**

**Enclosed: A/a.**

Date: July 14, 2021

To,  
BSE Limited  
P.J. Towers,  
Dalal Street,  
Mumbai-400 001, Maharashtra.

To,  
Axita Cotton Limited  
Survey No. 324 357 358 Kadi Thol Road Borisana  
Kadi  
Mahesana- 382715, Gujarat

Dear Sir/Madam,

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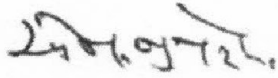
I, Nitinbhai Govindbhai Patel, promoter of Axita Cotton Limited hereby submit disclosures under the Regulation 7(2) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 for inter-se transfer through off-market of 6,76,000 number of Locked-in Equity Shares of Axita Cotton Limited from Amitkumar Govindbhai Patel.

I, Nitinbhai Govindbhai Patel hereby submit this disclosure based on delivery instruction slip (hereinafter known as "DIS" dated July 12, 2021) submitted by Mr. Amitkumar Govindbhai Patel and requisite procedural requirements of NSDL and RTA (Link-Intime India Private Limited) and Depository Participant (Beeline Broking Limited) are under process for transfer of 6,76,000 locked in Equity Shares. I am submitting this disclosure herewith for better compliance purposes. I will further resubmit disclosure post completion process of inter-se transfer of 6,76,000 Locked in Equity Shares.

In view of the subject matter, you are requested to take this on records and do the needful.

Kindly take this information on your record.

Thanking You.



**Nitinbhai Govindbhai Patel**  
Acquirer  
(Promoter)

Enclosed: A/a.

**FORM C**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7(2) read with Regulation 6(2) – Continual Disclosure]**

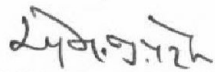
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 ISIN of the Company: INE02EZ01014

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		Type of Security (for e.g. - Shares Warrants Convertible Debentures, Rights entitlement etc.)	No. and % of Shareholding	Type of Security (for e.g. - Shares Warrants Convertible Debentures, Rights entitlement etc.)	No.	Value (Rs.)	Transaction Type (Purchase/Sell/Pledge/ Revocation/ Invokation/ Other Please specify)	Type of Security (for e.g. - Shares Warrants Convertible Debentures, Rights entitlement etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Name: Nitinbhai Govindbhai Patel PAN: ACZPP0185C CIN: N.A. DIN: 06626646. Address: B/303, Ashutosh Avenue, Opp. Vasupujya Tower, Naranpura, Ahmedabad-380013, Gujarat. Contact No.: +91 9879517471	Promoter	Equity Shares (Locked-in)	41,15,000 And 31.403%	Equity Shares (Locked-in)	6,76,000	1,86,57,600	Purchase  (Inter-se Transfer through off-market)	Equity Shares (Locked-in)	47,91,000 And 36.561%	12/07/2021	12/07/2021	14/07/2021	Inter-se Transfer through off-market	BSE Limited

Note:

- “Securities shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- Value of transaction excludes taxes/brokerage/any other charges

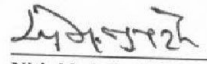


**Nitinbhai Govindbhai Patel**  
 Promoter  
 Date: 14/07/2021  
 Place: Kadi

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						
Type of contract	Contract specifications	Buy		Sell		Exchange on which the trade was executed
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Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

  
 Nitinbhai Govindbhai Patel  
 Promoter  
 Date: 14/07/2021  
 Place: Kadi